

UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET FOR THE PERIOD
MAY 1, 2024 THROUGH AUGUST 31, 2024

Debtor: LTL Management LLC Applicant: Molo Lamken LLP
Case No.: 23-12825 (MBK) Client: Official Comm. of Talc
Chapter: 11 Case Filed: April 4, 2023

SECTION 1
FEE SUMMARY

☐ Monthly Fee Application No. or ☒ Interim Fee Application No. 3 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from May 1, 2024 through August 31, 2024

Total Previous Fee Requested:	\$1,415,828.00
Total Previous Expenses Requested:	\$18,542.64
Total Fees Allowed To Date:	\$985,641.00
Total Expenses Allowed To Date:	\$17,251.04
Total Amount Paid To Date:	\$1,241,600.64
Holdback for May 2024-August 2024 Invoices:	\$13,071.50
Holdback for January-April 2024 Invoices:	\$78,318.00
Outstanding Non-Holdback Fees:	\$171,641.02
Outstanding Disbursements:	\$0.00

Total Outstanding Balance Sought to Be Paid at this Time: \$213,321.79

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ¹	FEE
1. Jeffrey A. Lamken	Partner 1991	14.4	\$1,975	\$28,440.00
2. Lucas Walker	Partner 2010	6.2	\$1,300	\$8,060.00
3. Justin Ellis	Partner 2011	0.5	\$1,350	\$675.00
4. Rayiner I. Hashem	Partner 2015	2.7	\$1,100	\$2,970.00
5. Kenneth Notter	Associate 2018	0.3	\$950	\$285.00
6. Nathaniel Rubin	Associate 2019	25.8	\$950	\$24,510.00

¹ Rates in this statement reflect the rates disclosed in our retention application and MoloLamken's Supplemental Declaration of Jeffrey A. Lamken Regarding Rate Increase for 2024 for MoloLamken LLP [Dkt. 1678].

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE ¹	FEE
7. Sara Tofighbakhsh	Associate 2022	0.3	\$850	\$255.00
8. Julia Downing	Paralegal	0.5	\$325	\$162.50
TOTALS		50.7		\$65,357.50

Fee Totals: \$65,357.50

Disbursements Totals: \$0.00

Total Fee Application: \$65,357.50

**SECTION II SUMMARY
OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.0	\$0.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	0.0	\$0.00
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	0.0	\$0.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	16.5	\$15,675.00
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	0.0	\$0.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	34.2	\$49,682.50
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341(a) meeting and creditors' committee meetings.	0.0	\$0.00
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	0.0	\$0.00
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.	0.0	\$0.00

SERVICES RENDERED	HOURS	FEE
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed @ 50%)	0.0	\$0.00
x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by-laws and addressing other governance matters.	0.0	\$0.00
y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) Hearings Preparation for and attendance at hearings.	0.0	\$0.00
aa) Mediation Preparation for and attendance at mediation.	0.0	\$0.00
SERVICE TOTALS:	50.7	\$65,357.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	\$0.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$0.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges. Court-Solutions	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$0.00
g) Outside Reproduction Services Including printing & scanning services. This includes trial preparation.	\$0.00
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) Court Reporting Transcripts.	\$0.00
j) Travel Mileage, tolls, airfare, rail fare, parking.	\$0.00
k) Courier & Express Carriers Overnight and personal delivery.	\$0.00
l) Postage	\$0.00
m) Other (specify) Professional Services BRI LLC In-House Investigative Services.	\$0.00
n) Other (specify) Trial Expenses	\$0.00
o) Other (specify) Professional Services	\$0.00
p) Other (specify) Deposition Services Paszkievich Court Reporting	\$0.00
q) Other (specify) Meals	\$0.00
r) Other (specify) eDiscovery Hosting In-House eDiscovery platform.	\$0.00
DISBURSEMENTS TOTAL:	\$0.00

I certify under penalty of perjury that the above is true.

Date: October 15, 2024

/s/ Jeffrey A. Lamken